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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

**CAMILO Q. PRIMERO, and
AURORA S. BELTRAN,**

Defendants.

2:17-cr-00205-APG-GWF

**STIPULATION FOR A
PROTECTIVE ORDER**

The parties, by and through the undersigned, respectfully request that the Court issue an Order, effective following the signing of the Order, protecting from disclosure to the public, or any third party not directly related to this case, any documents, recordings, or other tangible things produced by the Government during discovery under bates stamp numbers 000001 to 066237. The parties state as follows:

1. Commencing in July 2017, the Government has produced to Defendants Beltran and Primero discovery designated by bates stamp numbers 000001 to 066237 (the “discovery” or “discovery material”). The discovery contains private medical and

1 patient information of certain nonparties, and is too voluminous to redact.

2 2. During the time period from July 2017 to February 2018, various discovery
3 materials were provided to Defendant Primero.

4 3. On February 28, 2018, Defendants Primero and Beltran were ordered
5 detained pending trial. In order to prepare for trial, counsel for Defendants Primero and
6 Beltran wish to provide copies of the discovery in flash drive, disc, and/or paper format
7 to their clients who are currently detained pending trial at the Nevada Southern
8 Detention Center in Pahrump, Nevada.

9 4. In order to prevent further dissemination of this material, effective on the
10 date this Order is signed, the parties intend to restrict access to the discovery material
11 in this case to the following individuals: the defendants, attorneys for all parties, and
12 any personnel that the attorneys for all parties consider necessary to assist in
13 performing that attorneys' duties in the prosecution or defense of this case, including
14 copying services, investigators, paralegals, experts, support staff, interpreters, detention
15 facility personnel, and any other individuals specifically authorized by the Court
16 (collectively, the "Covered Individuals").

17 5. After the effective date of this order, without leave of Court, the Covered
18 Individuals shall not:

- 19 a. make copies for, or allow copies of any kind to be made by any other
20 person of the discovery in this case;
21 b. allow any other person to read, listen, or otherwise review the
22 discovery material;
23 c. use the discovery material for any other purpose other than
24 preparing to defend against or prosecute the charges in the

1 Indictment or any further superseding indictment arising out of this
2 case; or

3 d. attach to motions, pleadings, or briefs without appropriate
4 redactions any of the discovery material. If the material is incapable
5 of meaningful redaction, the Covered Individual will file the
6 document under seal.

7 6. This Stipulation and Order does not apply to previous disclosures of the
8 discovery.

9 7. This Stipulation and Order does not apply to the procedures and policies at
10 the Nevada Southern Detention Center relating to their review of materials coming into
11 the facility and the storage of said material.

12 8. Nothing in this stipulation is intended to restrict the parties' use or
13 introduction of the discovery material as evidence at trial or support in motion practice.

14 9. The parties shall inform any person to whom disclosure may be made
15 pursuant to this order of the existence and terms of this Court's order.

16 10. Should a reasonable need for this protective order cease to exist, on grounds
17 other than a Covered Individual or some other person violating or circumventing its
18 terms, the Government will move expeditiously for its dissolution.

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11. The defense hereby stipulates to this protective order.

Respectfully submitted,

For the United States:

DAYLE ELIESON
United States Attorney


/s/
PATRICK BURNS
Assistant United States Attorney

For the Defense:

/s/
JEFFREY B. SETNESS, ESQ.
WILLIAM MCMURREY, ESQ.
Attorneys for CAMILO Q. PRIMERO

/s/
BRET WHIPPLE
Attorney for AURORA S. BELTRAN

IT IS SO ORDERED:


GEORGE W. FOLEY
United States Magistrate Judge

6-12-2018
Date